

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

IN RE:

RENE COOPER

Debtor.

**Case No. 16-10792-LSS
Chapter 7**

MOTION FOR TURNOVER OF PROPERTY OF THE ESTATE

(Keys to 810 Faraway Court, Bowie, MD 20721)

COMES NOW Janet M. Nesse, Chapter 7 Trustee (“Trustee”) of the estate of Rene Cooper (“Debtor”), by and through counsel, McNamee Hosea, P.A., and pursuant to 11 U.S.C. § 542(a), submits this *Motion for Turnover of Property of the Estate* (“Motion”). In support of the Motion, the Trustee respectfully represents the following:

1. This case commenced on January 25, 2016 when the Debtor filed his voluntary petition under Chapter 13 of the United States Bankruptcy Code.
2. On May 18, 2016, the Debtor converted his case from Chapter 13 to Chapter 11.
3. On October 7, 2019, the Debtor’s case was converted from Chapter 11 to Chapter 7 due to the Debtor’s non-compliance with this Chapter 11.
4. Janet M. Nesse is the duly appointed and qualified Chapter 7 Trustee (“Trustee”) for the estate of the Debtor.
5. By this Motion, the Trustee is requesting that the Debtor produce the keys to the real property located at 810 Faraway Court, Bowie, MD 20721 (the “Property”).
6. The Property is property of the estate pursuant to 11 U.S.C. § 541, and has not been exempted.

7. Pursuant to 11 U.S.C. §542 (a), an entity in possession, custody or control of property that the trustee may use, sell, or lease, shall deliver to the Trustee and account for such property or the value of such property.

WHEREFORE, the Trustee respectfully requests that the Court enter an Order:

- a. Granting the Motion in its entirety;
- b. Requiring the Debtor to turnover the keys to the real property located at 810 Faraway Court, Bowie, MD 20721.
- c. Granting such other and further relief as is just and proper.

Dated: July 26, 2021

Respectfully submitted,

/s/Justin P. Fasano

Janet M. Nesse, No. 07804

Justin P. Fasano, No. 28659

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Counsel for the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2021, a copy of the foregoing Motion for Turnover of Property of the Estate was served via first class mail, postage prepaid (or, where indicated in bold, by certified mail or e-mail), upon the following.

Office of the U.S. Trustee
6305 Ivy Lane
Greenbelt, MD 20770

Rene Cooper
1413 Peartree Lane
Bowie, Maryland 20721

Brett Weiss
The Weiss Law Group, LLC
6404 Ivy Lane, Suite 650
Greenbelt, MD 20770
brett@bankruptcylawmaryland.com

I further certify that on July 26, 2021, a copy of the foregoing Motion for Turnover of Property of the Estate was served via CM/ECF, upon the following.

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/s/ Justin P. Fasano
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